

**REMARKS**

This Amendment is filed in response to the Office Action mailed on March 22, 2007. All objections and rejections are respectfully traversed.

New Claims 77 - 103 are in the case.

Claims 1, 3-28, and 54-76 were cancelled without prejudice.

No claims were amended.

**Request For Interview**

The Applicant respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The Applicant may be reached at 617-951-3028.

At Page 2 of the Office Action, claims were rejected under 35 U.S.C. 103(a) as being unpatentable over Chu et al. U. S. Patent 6,346,954 issued Feb. 12, 2002 (hereinafter Chu), in view of Pisello et al. U. S. Patent No. 5,678,042 (hereinafter Pisello).

At Page 10 of the Office Action, claims were rejected under 35 U.S.C. 103(a) over Chu in view of Pisello, and further in view of Salas et al. U. S. Patent No. 6,233,600 (hereinafter Salas).

Applicant respectfully urges that since the pending claims were cancelled without prejudice that the above rejections are now moot.

### **NEW CLAIMS**

Applicant respectfully urges that the NEW claims are allowable over all cited art.

Applicant's claimed invention, as set forth in representative NEW claim 77, comprises in part:

77. A method for managing a computer network, comprising:

*operating a plurality of servers connected to the network, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks;*

*assigning selected storage devices of the one or more storage devices to a particular volume, the one or more storage devices assigned to a plurality of volumes;*

*consolidating one or more selected volumes of the plurality of volumes into a group of volumes;*

*identifying a party interested in statistical information related to operation of a selected group of volumes; and*

displaying the statistical information related to the selected group of volumes to the party identified as interested in the statistical information of the selected group of volumes.

Chu, as explained at page 16 of the Amendment filed by Applicant on January 5, 2005, is described as follows.

“Chu discloses a method for managing a RAID system that may have a number of drive arrays, each array including multiple disk drives. *See* col. 1, lines 30-35, col. 6, lines 33-42, and Fig 3. Information concerning an array is displayed to a user graphically in an “array frame, an iconic representation of a data storage array [that] may be graphically displayed in response to user selections.” *See* col. 6, 53-56. For example, “in Fig 6, array A frame 90 graphically displays and [sic] iconic representation of data storage array A including five physical drive ID1, ID2, ID3, ID4, and ID4 selected by the

user.” See col. 8, lines 51-55. If a user wishes to manage other drive arrays of the RAID system, the user must switch to another array frame in the graphical user interface. See col. 6, lines 52-60.”

Pisello discloses a domain wide administrating server. Pisello’s domain wide administrating server stores a virtual catalog representing an overview of all files stored across a network domain, either currently or in the past. The current information is used in transferring files across the domain. The past information is used for auditing or locating files.

Salas discloses establishing a collaborative work environment. In the environment, client workstations receive data objects from one or more servers so that a user may view, edit, and create common documents for a project.

Applicant respectfully urges that the NEW claims are allowable in view of all cited art, under 35 U.S.C. 102 and under 35 U.S.C. 103.

In particular, Chu has no disclosure of Applicant’s claimed novel

*operating a plurality of servers connected to the network, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks;*

*assigning selected storage devices of the one or more storage devices to a particular volume, the one or more storage devices assigned to a plurality of volumes;*

*consolidating one or more selected volumes of the plurality of volumes into a group of volumes;*

*identifying a party interested in statistical information related to operation of a selected group of volumes.*

That is, Chu describes a system with a plurality of RAID arrays of disks, and he monitors the individual disks of his RAID arrays.

Applicant respectfully urges that Chu has no disclosure of Applicant's claimed novel *operating a plurality of servers connected to the network, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks*.

Chu, in contrast, has a plurality of RAID arrays which he monitors by use of the computer shown in his Fig. 1. Chu has no disclosure of Applicant's claimed *operating a plurality of servers connected to the network*.

Further, Applicant respectfully urges that Chu has no disclosure of Applicant's claimed novel *assigning selected storage devices of the one or more storage devices to a particular volume, the one or more storage devices assigned to a plurality of volumes*.

Chu, in contrast, has a plurality of RAID arrays which he monitors using his computer of his Fig. 1. Chu has no disclosure of Applicant's claimed *the one or more storage devices assigned to a plurality of volumes*. That is, Chu has no disclosure of volumes.

Even further, Applicant respectfully urges that Chu has no disclosure of Applicant's claimed novel *consolidating one or more selected volumes of the plurality of volumes into a group of volumes*. That is, Chu has no disclosure of Applicant's concept of *a group of volumes*. In contrast, Chu simply has a plurality of RAID storage arrays, and he monitors them.

Still further, Applicant respectfully urges that Chu has no disclosure of Applicant's claimed novel *identifying a party interested in statistical information related to operation of a selected group of volumes*. Chu simply has his computer of his Fig. 1, and a person using this computer can monitor Chu's plurality of RAID arrays.

Chu, Applicant respectfully asserts, teaches away from Applicant's claimed invention. Chu teaches away from Applicant's claimed invention because Chu teaches that a plurality of RAID arrays can only be managed together.

By Chu completely missing Applicant's novel *operating a plurality of servers, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage*

*disks . . . assigning selected storage devices of the one or more storage devices to a particular volume . . . consolidating one or more selected volumes of the plurality of volumes into a group of volumes . . . and finally identifying a party interested in statistical information related to operation of a selected group of volumes*, in order to display the *statistical information related to operation of a selected group of volumes* to a party identified as interested in the *selected group of volumes*, Chu would lead a person of ordinary skill away from Applicant's claimed invention. That is, Chu teaches monitoring his RAID arrays together, Applicant claims grouping and dividing his data storage devices into volumes of interest to parties. With no hint of Applicant's claimed grouping and dividing, Chu teaches away from Applicant's claimed novel invention.

Pisello discloses a network domain, and the entire domain is managed as a whole by a single domain administrating server. Again, Pisello teaches away from Applicant's claimed novel invention, because of the absence from Pisello's disclosure of Applicant's claimed novel *operating a plurality of servers, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks . . . assigning selected storage devices of the one or more storage devices to a particular volume . . . consolidating one or more selected volumes of the plurality of volumes into a group of volumes . . . and finally identifying a party interested in statistical information related to operation of a selected group of volumes*, in order to display the *statistical information related to operation of a selected group of volumes* to a party identified as interested in the *selected group of volumes*.

Salas simply discloses a collaborative work environment, and also has no disclosure of Applicant's claimed structure. Again, Salas teaches away from Applicant's claimed novel invention, because of the absence from Salas' disclosure of Applicant's claimed novel *operating a plurality of servers, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks . . . assigning selected storage devices of the one or more storage devices to a particular volume . . . consolidating*

*one or more selected volumes of the plurality of volumes into a group of volumes . . .*  
and finally *identifying a party interested in statistical information related to operation of a selected group of volumes*, in order to display the *statistical information related to operation of a selected group of volumes* to a party identified as interested in the *selected group of volumes*.

Accordingly, Applicant respectfully urges that the cited art is legally insufficient to anticipate Applicant's claimed novel invention under 35 U.S.C. 102 because of the absence from all cited art of Applicant's claimed novel

*operating a plurality of servers connected to the network, each server of the plurality of servers connected to one or more storage devices, each storage device of the one or more storage devices having one or more data storage disks;*

*assigning selected storage devices of the one or more storage devices to a particular volume, the one or more storage devices assigned to a plurality of volumes;*

*consolidating one or more selected volumes of the plurality of volumes into a group of volumes;*

*identifying a party interested in statistical information related to operation of a selected group of volumes.*

Further, since each of the cited patents teaches away from Applicant's claimed invention, Applicant respectfully urges that a person of ordinary skill in the art would be led astray from Applicant's claimed invention, and that the cited art is legally insufficient to render Applicant's claimed novel invention obvious under 35 U.S.C. 103.

All independent claims are believed to be in condition for allowance.

All dependent claims are dependent from independent claims which are believed to be in condition for allowance. Accordingly, all dependent claims are believed to be in condition for allowance.

Favorable action is respectfully solicited.

Please charge any additional fee occasioned by this paper to our Deposit Account  
No. 03-1237.

Respectfully submitted,

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